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**From:** Marcy, Ken [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=AF47C9A01A4340379E366A47FBBA5057-MARCY, KEN]  
**Sent:** 2/26/2020 6:43:58 PM  
**To:** Jon Germond [Jon.p.Germond@state.or.us]  
**Subject:** FW: Bradford Island: Information regarding fishing within the zone of contamination  
**Attachments:** Figure 6 Bradford Island Package.pdf

Hi Jon,

Here is the message from Jeremy Buck – the reason we are soliciting input from both state and federal is that they information specific to their respective lists of fish in that area of the river – and possibly different levels of information regarding actual fishing in the area (and zone of contamination – see attached). Please share with the appropriate folks in the field office. I will also try and dig up an example letter we have received in the past for an NPL listing package as a model.

Thanks! ken

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**From:** Buck, Jeremy <jeremy\_buck@fws.gov>  
**Sent:** Tuesday, February 11, 2020 11:36 AM  
**To:** Marcy, Ken <Marcy.Ken@epa.gov>  
**Cc:** shil@yakamafish-nsn.gov; SCHWARZ Bob <Bob.SCHWARZ@state.or.us>  
**Subject:** FW: Bradford Island: Information regarding fishing within the zone of contamination

Hi Ken-

Your request below covers multiple agencies. If you want to receive information on letterhead, then you will have to make the request to the individual agencies. I have sent an email to NMFS to find a contact for the NMFS species. Meanwhile, I have added to your list the agencies that would need to be contacted based on the subject. See below in red text:

Sensitive environments:

- Critical habitat for Federal or State designated Endangered or Threatened species. Specify which species including scientific name and listing status (Fed or State, Endangered or Threatened).

This would be USFWS, NMFS, and Oregon Department of Fish and Wildlife (ODFW). I have sent an email to NMFS to get contact information.

For USFWS, the only listed species is bull trout (*Salvelinus confluentus*), listed as Threatened in 1998. The area around Bradford Island is part of their potential range and within their critical habitat, which was designated in 2005 and revised in 2010. Information on bull trout is here: <https://www.fws.gov/oregonfwo/articles.cfm?id=149489411>. Note that although the area around Bradford Island is within designated critical habitat, they have not been found there in years.

For ODFW, their list of species is here:

[https://www.dfw.state.or.us/wildlife/diversity/species/threatened\\_endangered\\_candidate\\_list.asp](https://www.dfw.state.or.us/wildlife/diversity/species/threatened_endangered_candidate_list.asp) and you would need to contact somebody there for receiving letter.

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- Habitat known to be used by Federal or State Endangered or Threatened species. Specify which species including scientific name and listing status (Fed or State, Endangered or Threatened).

I suspect you mean critical habitat here, but I am not sure what “known to be used” means in this context. Does this mean a designated official has observed or trapped the listed species within the habitat? Not a designation we use. Bull trout are not now known to use the habitat around Bradford Island, but they did at one time and may show up once in a while, but this is currently extremely rare.

For listed species other than bull trout, ODFW and NMFS would be the primary contact.

- Spawning areas critical for the maintenance of fish/shellfish species.

Shellfish are under the State’s jurisdiction, Oregon Department of Fish and Wildlife. And, the Oregon Health Authority lists advisories for fish and shellfish such as this:

<https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/RECREATION/FISHCONSUMPTION/Pages/Bonneville.aspx>.

The habitat around Bradford Island would not be considered a spawning area for bull trout. The state (ODFW) would have information on nonlisted fish.

- Migratory pathway and/or feeding areas critical for the maintenance of anadromous fish species within the river.

Pacific lamprey (*Lampetra tridentata*) is an anadromous fish species of concern for the US Fish and Wildlife Service, and the area would be an important migratory corridor for the adults and likely feeding area for the larval lamprey. We have some conservation recommendations and have released Best Management Practices to Minimize Adverse Effects to Pacific lamprey. A summary of efforts and documents can be found here: <https://www.fws.gov/pacificlamprey/mainpage.cfm>

There is also recent concern for the conservation of mussels, and USFWS is recommending practices for conservation of mussels in Oregon. In the Columbia River around Bradford Island it is likely the that area contains floaters (genus *Anodonta*), western ridged mussel (*Gonidea angulata*), and western pearlshell (*Margaritifera falcata*).

It should also be noted that thirteen acres of wooded area (wildlife management area) in the upland portion of Bradford Island are specifically managed for wildlife use, primarily for goose nesting and pasture.

Hope this helps somewhat. —Jeremy

Jeremy A. Buck  
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**From:** Marcy, Ken <Marcy.Ken@epa.gov>  
**Sent:** Tuesday, February 11, 2020 7:31 AM  
**To:** shil@yakamafish-nsn.gov; Buck, Jeremy <jeremy\_buck@fws.gov>  
**Cc:** SCHWARZ Bob <Bob.SCHWARZ@state.or.us>  
**Subject:** [EXTERNAL] RE: Bradford Island: Information regarding fishing within the zone of contamination

Jeremy, Laura,

Sorry for the second email – I forgot to include several important items in my request. Here is a better and more complete list of the information we need. I also forgot to include areas outside and downstream of the zone. And the last thing I forgot to add was that we need to have this information in the form of a letter on agency/Tribal letterhead. An initial email response would be great, followed by a letter (to me – address below) if you have information to provide. Let me know if you have any question. Your help is greatly appreciated!

Sensitive environments:

- Critical habitat for Federal or State designated Endangered or Threatened species. Specify which species including scientific name and listing status (Fed or State, Endangered or Threatened).
- Habitat known to be used by Federal or State Endangered or Threatened species. Specify which species including scientific name and listing status (Fed or State, Endangered or Threatened).
- Spawning areas critical for the maintenance of fish/shellfish species.
- Migratory pathway and/or feeding areas critical for the maintenance of anadromous fish species within the river.

Human Food Chain Organisms:

- Indicate whether recreational or subsistence fishing or shellfish harvesting occurs, including the type of fish/shellfish caught or sought. Please specifically state the caught/sought species are for *human consumption*. If any fish catch or harvest information is available for this area, please provide it (I realize this is unlikely, but asking just in case).
- If fishing/harvesting does not occur within the Zone of Actual Contamination due to a perception of contamination, please also state that and give details.

If any of the above is present outside and downstream of the Zone of Actual Contamination, please provide that information in the letter of response.

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**From:** Marcy, Ken  
**Sent:** Tuesday, February 11, 2020 7:26 AM  
**To:** shil@yakamafish-nsn.gov; Jeremy\_Buck@fws.gov  
**Cc:** SCHWARZ Bob <Bob.SCHWARZ@state.or.us>  
**Subject:** Bradford Island: Information regarding fishing within the zone of contamination

Hello Jeremy, Laura,

EPA Region 10 is preparing the Superfund NPL listing package for Bradford Island. One piece of information we don't have for the hazard ranking model is confirmation of current fishing, or historical fishing within the "zone of contamination" established by the data sets we have. The zone is defined by a number of criteria within our model.

Attached is a figure of the zone of contamination. What I'm hoping you can help me with is any information – actual documentation, discussions with individuals, observations, etc. – that can help answer the following questions:

- Do people currently fish or harvest organisms within the zone of contamination?
- Did people historically fish or harvest within the zone of contamination, but stopped due to concerns about contamination?
- If people currently or historically fish in the zone, did they fish for bass (critical driver species)? Do or did they harvest any other kinds of organisms in the zone (here we don't have to be specific regarding the type of organism)?

Any help you can provide would be greatly appreciated! Thanks, Ken

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